

**2449**

**CLOSURE PLAN FOR THE FEED MATERIALS  
PRODUCTION CENTER BULK STORAGE TANKS  
T-5 AND T-6  
SEPTEMBER 1989 (REVISED JUNE 1990)**

**06/01/90**

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ENCLOSURE**

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CLOSURE PLAN FOR THE  
FEED MATERIALS PRODUCTION CENTER  
BULK STORAGE TANKS T-5 AND T-6

SEPTEMBER 1989  
(REVISED JUNE 1990)

U. S. Department of Energy  
Feed Materials Production Center  
P. O. Box 398704  
Cincinnati Ohio 45239-8704

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## INTRODUCTION

The Feed Materials Production Center (FMPC) is a U.S. Department of Energy (DOE) owned facility operated for the purpose of producing metallic uranium fuel elements, target cores, and other uranium compounds. These materials are used at other DOE facilities in support of the U.S. defense program.

During production operations, wastes are generated which can become contaminated with uranium. The wastes generated include a mixture of both RCRA hazardous and radioactive (mixed) wastes, however, for the purpose of this closure only RCRA wastes will be addressed. The bulk storage tanks, two 10,000 gallon stainless steel tanks located west of the Pilot Plant (Figure 1), and designated as T-5 and T-6 in the plant operations, contained a blend of the spent solvent 1,1,1-trichloroethane and mineral spirits. This waste was generated at an off-site facility and shipped to the FMPC for recovery. Due to problems encountered with the solvent recovery operations, these operations were suspended and the remaining material was stored in T-5 and T-6. Due to concerns about the integrity of the tanks, in 1989, the material was transferred to drums which are stored at the FMPC in a RCRA approved storage unit. It is planned that the wastes ultimately will be shipped to the DOE K-1435 Incinerator in Oak Ridge, Tennessee for final disposition.

Documentation providing specifications, drawings and a detailed operational history for T-5 and T-6 (including analyses of wastes stored through time) has not been identified. Based on records reviewed to date, the tanks were obtained by FMPC as surplus property from another DOE operation in 1969. The tanks were set on steel I-beam tank supports (the bottom of the tank is about two feet above the concrete) in the containment area of tanks T-2, T-3 and T-4 (see Figure 2) to provide additional storage capacity for thorium nitrate solutions. According to historical accounts, in about 1980, T-5 and T-6 were no longer needed for storage of thorium nitrate and are believed to have been empty until approximately 1983. Beginning in 1983, the solvent blend described above was stored in the tanks. Subsequently, the solvent blend was transferred to drums as described above. A search for additional records, including historical

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analyses of waste, documentation of any spills, operational procedures and records, tank and associated piping specifications and drawings, containment pad specifications and drawings has been initiated. If dimensioned drawings of the tanks and containment pad cannot be located, these will be created. Any further documentation discovered and any drawings created will be provided to the Ohio EPA. Should any documentation be identified that would necessitate modification of this Closure Plan, an amended plan will be submitted.

**I-1 CLOSURE PLAN**

This Closure Plan is submitted in accordance with RCRA closure requirements for units with interim status in accordance with OAC 3745-66-10. The Closure Plan must identify the steps to be taken to completely close the facility at the end of its operating life. Copies of the Closure Plan and all revisions to the plan must be kept at the facility until final closure has been completed in accordance with OAC 3745-66-15. The FMPC RCRA Part B Permit Application includes a facility Closure Plan that outlines the general steps necessary to close any of the FMPC's hazardous waste TSD units for which a permit is being sought. Tanks T-5 and T-6 are not addressed as units to be permitted in the Part B Application since they are to be closed under interim status. These FMPC units are, however, listed in Part A submitted on March 23, 1989.

This Closure Plan specifically addresses closure of the two Bulk Storage Tanks for waste solvents and associated containment pad located west of the Pilot Plant. To meet the requirements of OAC 3745-66-12 A, the most recent copy of the Closure Plan will be provided to the Ohio EPA upon request. Also, the plan will be available for Ohio EPA review if requested during site inspections. Should an amendment to the Bulk Storage Tanks Closure Plan be required for either of the reasons listed below, a written request for amendment will be provided to the Ohio EPA and will include a copy of the amended closure plan. The following situations would require an amendment to the plan:

- o A change in the expected date of closure.
- o An unexpected event encountered during closure activities.
- o A proposed change in the operating plans or facility design that affects closure.

If any of these events occur, an amendment to the closure plan will be submitted to the Ohio EPA within 60 days of the occurrence. If these



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events occur during the closure period, an amendment will be submitted within 30 days of the occurrence.

During closure of Tanks T5 and T6, FMPC Health and Safety procedures will be followed that comply with the Occupational Safety and Health Administration's requirements for protection of personnel.

#### I-1a Closure Performance Standard

Closure of the two waste solvent storage tanks will be in accordance with OAC 3745-66-11.

The FMPC will close the facility in a manner that:

- o Minimizes further maintenance by decontaminating the tanks, the storage/containment area around them, and any piping or appurtenances included in their operation.

Any equipment, parts, or related materials which cannot be cleaned to acceptable limits will be dismantled and moved to an approved FMPC RCRA storage unit.

Post-closure maintenance is not anticipated because it is expected that all wastes and contaminated material will be removed from the unit. At closure all soil that is demonstrated to contain unacceptable levels of hazardous waste constituents by analysis will be removed as required in OAC 3745-66-97.

- o Controls, minimizes, or eliminates to the extent necessary to protect human health and the environment, the escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere. This will be accomplished by removing any remaining waste materials from

the tanks and piping, properly decontaminating the tanks and piping, and placing all tank and piping contents, rinseates, and any non-decontaminated equipment into proper storage containers and moving these to RCRA storage areas within the FMPC facility.

#### **I-1b Partial Closure and Final Closure Activities**

This plan is for complete closure of tanks for the bulk storage of waste solvents at the Pilot Plant, and will identify all steps necessary to completely close this unit. The unit is currently inactive and no new hazardous waste operations will be conducted at the unit after it is closed. This is considered partial closure of the FMPC since only one of the units is being closed.

#### **I-1c Maximum Waste Inventory**

The tanks T-5 and T-6 used for the bulk storage of waste solvents are 10,000 gallon tanks. Therefore the maximum waste inventory for each tank is 10,000 gallons. Both tanks have been used for storage of a blend of 1,1,1-trichloroethane and mineral spirits (F001 wastes) in the most recent past. Because the contents of the tanks were transferred into drums, the tanks are believed to be empty but may contain small volumes of the solvent blend.

A determination of materials stored historically in T-5 and T-6 will be made through review of available operating records. If sufficiently detailed records (documentation of process knowledge, chemical analyses, etc.) are not available, it will be assumed that the tanks could have been used to store a wide variety of FMPC products and waste. This assumption requires that an extensive suite of analytical parameters be included in verification of decontamination and determining the extent of any affected soil (see Tables 1 and 2 for parameter list).

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Should reliable information be obtained that permits limiting the number of hazardous constituents of concern, the analytical program will be modified after gaining the consent of the Ohio EPA.

#### **I-1d Inventory Removal, Disposal, or Decontamination of Equipment**

The Bulk Storage Tanks for waste solvents include the following:

- 2 - 10,000 gallon stainless steel tanks
- Associated piping and transfer lines
- Diked, concrete containment structure 28 feet by 45 feet with a 20-inch high dike, which has an approximately 28,000 gallon capacity.

Tanks T-5 and T-6 are in the containment structure with three (3) other tanks; T-2, T-3 and T-4. Tank 2 has a capacity of 7,707 gallons and contains a full tank of thorium nitrate. Tank 3 has a capacity of 8,000 gallons and is confirmed empty. Tank 4 has a capacity of 14,000 gallons and is confirmed empty. Both tanks 3 and 4 previously held thorium nitrate.

##### **I-1d(1) Closure of Containers**

Because no containers are present within the containment structure or associated with T-5 and T-6, this section does not apply to this Closure Plan.

##### **I-1d(2) Closure of Tanks**

This Closure Plan specifically addresses the closure of the two 10,000-gallon bulk storage tanks for waste solvents and the containment structure and associated piping. Closure covers the disposal of any remaining waste inventory, decontamination, and confirmation of

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the final cleaning. Analyses will be as recommended in SW-846. Wastes, washwaters and rinseates, and other associated equipment will be properly containerized and stored in the RCRA storage areas, as necessary, pending results of the analyses.

Residual wastes are expected to be present within the tank and the piping and valve systems. These will be decontaminated as well, using the same methods as for the tank. Although the containment pad and dike appear to be in good condition (based on a cursory visual inspection), soils beneath the concrete as well as in surrounding areas could have existing contamination due to spillage, etc. Soils will be sampled and analyzed in accordance with SW-846.

Initial closure actions require the removal of any remaining contents within the tanks. If present, the contents will be pumped into containers compatible with 1,1,1-trichloroethane and mineral spirits, preferably carbon steel lined with teflon. These will then be moved to the RCRA storage pad to await disposal at an approved site. All piping will be examined to assure that no materials remain.

Next, the decontamination of the tanks will be accomplished through the use of hot water and detergent high-pressure spray and rinse. Decontamination rinse water will be drained from the bottom of the tank using existing piping and valves. The piping and other devices will then be decontaminated if possible. It is possible that decontamination of piping, valves, etc. could generate manyfold more waste volume than the volume of the piping, valves, etc. Should this appear to be the

case, equipment will be dismantled and placed into appropriate containers for removal to the RCRA storage facility to await disposal. The tank wash and rinseate will be collected in appropriate containers. These wastes will then be sampled and analyzed for a wide variety of RCRA organic and inorganic compounds as listed in Tables 1 and 2. Samples will be collected from the containers using a COLIWASA which will provide a representative sample of the containerized washwaters and rinseate. If the fluids are hazardous, they will be moved to the RCRA storage facility. If not, they will be treated at the FMPC wastewater system. A concentration of RCRA constituents greater than those specified in Table 3 will require storage of the liquid as hazardous. Wastes will be analyzed in accordance with procedures set forth in SW-846 (see Tables 1 and 2).

To determine if tanks and pads have been decontaminated effectively, a rinseate analysis will be performed. Clean levels for rinseate are shown in Table 3. If the MCL or MCLG is less than the contaminant's analytical detection limit using methods found in USEPA publication SW-846, the SW-846 analytical detection limit shall be used as the clean standard.

All sampled materials will be held until analytical results are available. If concentrations are below the aforementioned limits, the materials can be disposed of as non-hazardous solid waste. If the limits set forth herein are exceeded, the pertinent material will be further decontaminated and the final rinseate sampled and analyzed to verify decontamination. If it appears that decontamination is not possible without generating an excessive volume of hazardous wastewater (more than

that needed to wash the tanks three times), the material/equipment will be dismantled and discarded as hazardous waste or mixed radioactive waste.

The containment structure will also be decontaminated using a high pressure detergent wash and rinse. The wash and rinseate will be collected, sampled, and analyzed for the constituents as listed in Tables 1 and 2. If these are below the previously specified levels for wash waters, they may be disposed of at the FMPC wastewater system, if not then they must be containerized and stored on the RCRA storage pad to await proper disposal. The final rinseate samples will provide verification (or denial) of decontamination of the containment structure. Samples shall be collected using a COLIWASA which will provide a representative sample of container contents.

The soils beneath and surrounding the containment structure will also be sampled and analyzed. A sampling and analysis plan for the soils beneath Tanks T-5 and T-6 is provided in Appendix A to this Closure Plan.

As outlined in Appendix A, the containment pad and diking will be closely inspected for cracks or other damage that may have leaked material to the soil underneath or surrounding the pad. If cracks or other damage is found during this inspection, directed sampling of the soil will be done at these potential release points. These areas will be designated by the project engineer and recorded in a log book.

At closure, all soil that is demonstrated to contain unacceptable levels of hazardous waste constituents by

analysis will be removed as required in OAC 3745-66-97.

**I-1d(3) Closure of Waste Piles**

This section does not apply to this Closure Plan. No waste piles are associated with the bulk storage tanks for waste solvents.

**I-1d(4) Closure of Surface Impoundments**

This section does not apply to this Closure Plan. No surface impoundments are associated with the bulk storage tanks for waste solvents.

**I-1d(5) Closure of Incinerators**

This section does not apply to this Closure Plan. No incinerators are associated with the bulk storage tanks for waste solvents.

**I-1d(6) Closure of Land Treatment Facilities**

This section does not apply to this Closure Plan. No land treatment facilities are associated with the bulk storage tanks for waste solvents.

**I-1e Closure of Land Disposal Units**

This section does not apply to this Closure Plan. No disposal units are associated with the bulk storage tanks for waste solvents.

If contamination remains following excavation and removal attempts, this Closure Plan could be amended to include methods to safely

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isolate remaining contaminated materials from the environment. Some of these methods may necessitate post-closure care.

#### I-1f Schedule for Closure

The expected date for initiation of closure activities is the date that the Closure Plan is approved. The Schedule for Closure is provided in Table 4 of this Closure Plan. It is anticipated that removal of any remaining RCRA hazardous waste in the tanks can be accomplished within 90 days after receipt of approval of this Closure Plan. Because the tank area in which T-5 and T-6 are located was used for storage of thorium nitrate, the area is considered to represent a potential radiological hazard to workers who will perform the closure. Thus, closure activities will have to be performed in a manner consistent with radiological safety. Accordingly, the time required for closure is expected to be 240 days with certification of closure 60 days after completion of physical closure. Table 4 provides approximate milestones for closure; the time required for decontamination of equipment and removal of soils will depend on the extent of contamination found on the equipment and in the soils.

#### I-1g Extension for Closure Time

The schedule presented in Table 4 indicates that closure is anticipated within 240 days. If during closure activities, it is determined that closure activities will require more than 240 days to complete, FMPC will notify Ohio EPA and submit a request for an extension of the closure time. Unexpected events that might warrant a need for extension in closure time might include inclement weather, delay in laboratory analysis of soils and rinseates, or need for extensive excavation of contaminated soils.



#### **I-1h Certification of Closure**

The FMPC and an independent registered Professional Engineer shall submit certification of closure. The certification will meet the requirements of OAC 3745-66-15.

In addition, the Ohio EPA's facility inspector shall be contacted at least five business days in advance of certain critical closure activities. These activities shall be designated as soil sampling or removal and rinse water sampling.

#### **I-2 POST-CLOSURE PLAN**

As noted in OAC 3745-66-10 B, post-closure care and a Post-Closure Plan are required only when closing hazardous waste surface impoundments, land treatment units, landfills or tanks. The Bulk Storage Tanks are considered this type of unit. Post-closure care is required only for tanks when all contaminated soils cannot be removed during closure. During this closure it is anticipated that any contaminated soils will be removed. However, if during closure it becomes evident that all contaminated soils cannot be removed (necessitating use of in-situ closure methods), a Post-Closure Plan will be developed for Tanks T-5 and T-6 and submitted to the Ohio EPA for approval.

#### **I-3 NOTICE IN DEED**

A notation in the property deed is required under OAC 3745-66-19 B 1 for a closure which involves post-closure care. If post-closure care is required for reasons outlined in I-2 above, a notation will be made in the FMPC property deed.

#### **I-4 CLOSURE COST ESTIMATE**

This section is not applicable to this Closure Plan. The FMPC is a federally owned facility. According to OAC 3745-66-40 C, the Federal Government is exempt from financial requirements, which include submittal of a cost estimate for closure.

#### **I-5 FINANCIAL ASSURANCE MECHANISM FOR CLOSURE**

This section is not applicable to this Closure Plan. The FMPC is a federally owned facility. According to OAC 3745-66-40 C, the Federal Government is exempt from Financial Requirements, which include submittal of a financial assurance mechanism for closure.

#### **I-6 POST-CLOSURE COST ESTIMATE**

This section is not applicable to this Closure Plan because post-closure care is not anticipated.

#### **I-7 FINANCIAL ASSURANCE MECHANISM FOR POST-CLOSURE CARE**

This section is not applicable to this Closure Plan because post-closure care is not anticipated.

#### **I-8 LIABILITY REQUIREMENTS**

This section is not applicable to this Closure Plan. The FMPC is a federally owned facility. According to OAC 3745-66-40 C, the Federal Government is exempt from Subpart H, Financial Requirements, which includes submitting proof of liability in the event of an accident.

TABLE 1  
TCLP METALS ANALYSES  
AND HOLDING TIMES

<u>RCRA Metals</u>	SW-846 <u>Detection</u> <u>Method</u> <sup>1</sup>	<u>Holding</u> <u>Time</u>
Arsenic	6010	6 months
Barium	6010	6 months
Cadmium	6010	6 months
Total Chromium	6010	6 months
Lead	6010	6 months
Mercury	7470	28 days
Selenium	6010	6 months
Silver	6010	6 months

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<sup>1</sup>TCLP Extraction Procedure EPA 1311 will be used.

TABLE 2

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SELECTED VOLATILE  
AND SEMI-VOLATILE ORGANIC COMPOUNDS  
FOR INITIAL SOIL SAMPLE TESTING

Compound	Practical Quantitation Limits		
	SW-846 Analytical	Water	Soil/Solid
	Method	g/l	g/kg
Acetone	8240	100	100
Benzene	8240	5	5
n-Butyl alcohol	None	N/A	N/A
Carbon disulfide	8240	5	5
Carbon tetrachloride	8240	5	5
Chlorinated fluorocarbons <sup>1</sup>	None	N/A	N/A
Chlorobenzene	8240	5	5
Chloroethane	8240	10	10
Chloromethane	8240	10	10
Cresols <sup>1</sup>	8270	10	660
Cresylic acid <sup>1</sup>	8270	50	3300
Cyclohexanone	None	N/A	N/A
1,1-Dichloroethane	8240	5	5
1,2-Dichloroethene	8240	5	5
trans-1,2-Dichloroethene	8240	5	5
1,2-Dichloroethane	8240	5	5
p-Dichlorobenzene	8270	10	660
p-Ethoxyethanol	8240	5 <sup>2</sup>	5 <sup>2</sup>
Ethyl acetate	None	N/A	N/A
Ethyl benzene	8240	5	5
Ethyl ether	8240	5 <sup>2</sup>	5 <sup>2</sup>
Isobutanol	8240	100	100
Methanol	8240	5 <sup>2</sup>	5 <sup>2</sup>
Methyl ethyl ketone	8240	100	100
Methyl isobutyl ketone	8240	50	50

TABLE 2 (continued)

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SELECTED VOLATILE  
AND SEMI-VOLATILE ORGANIC COMPOUNDS  
FOR INITIAL SOIL SAMPLE TESTING

Compound	SW-846 Analytical Method	Practical Quantitation Limits	
		Water	Soil/Solid
		g/l	g/kg
Methylene chloride	8240	5	5
Nitrobenzene	8270	10	66
2-nitropropane	8240	5 <sup>2</sup>	5 <sup>2</sup>
Pyridine	8270	10 <sup>2</sup>	660 <sup>2</sup>
Tetrachloroethylene	8240	5	5
Toluene	8240	5	5
1,1,1-Trichloroethane	8240	5	5
1,1,2-Trichloroethane	8240	5	5
Trichloroethylene	8240	5	5
1,1,2-Trichloro -1,2,2-trifluoroethane	None	N/A	N/A
Trichlorofluoromethane	8240	5	10
Vinyl chloride	8240	10	10
Xylenes	8240	5	5

<sup>1</sup> A class of chemicals and compounds. No single test is available.

<sup>2</sup> No established SW-846 Quantitative Limit. Values are

Note: Quantification limits depend on both matrix and interfering compounds.

TABLE 3

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STANDARDS OF CLEAN FOR WATER AND RINSEATE  
(mg/l)

<u>Compound</u>	Ohio EPA	
	<u>MCL</u>	<u>Standard</u>
Acetone		1.0
Benzene	0.005	
n-Butyl alcohol		1.0
Carbon disulfide		1.0
Carbon tetrachloride	0.005	
Chlorinated		
fluorocarbons <sup>1</sup>		1.0
Chlorobenzene		1.0
Chloroethane		1.0
Chloromethane		1.0
Cresols <sup>1</sup>		1.0
Cresylic acid <sup>1</sup>		1.0
Cyclohexanone		1.0
1,1-Dichloroethane		1.0
1,1-Dichloroethene	0.007	
trans-1,2-Dichloroethene		1.0
1,2-Dichloroethane	0.005	
o-Dichlorobenzene	0.01	
2-Ethoxyethanol		1.0
Ethyl acetate		1.0
Ethyl benzene		1.0
Ethyl ether		1.0
Isobutanol		1.0
Methanol		1.0
Methyl ethyl ketone		1.0
Methyl isobutyl ketone		1.0
Methylene chloride		1.0
Nitrobenzene		1.0
2-nitropropane		1.0
Pyridine		1.0
Tetrachloroethylene		1.0

TABLE 3 (continued)

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STANDARDS OF CLEAN FOR WATER AND RINSEATE  
(mg/l)

<u>Compound</u>	Ohio EPA	
	<u>MCL</u>	<u>Standard</u>
Toluene		1.0
1,1,1-Trichloroethane	0.2	
1,1,2-Trichloroethane		1.0
Trichloroethylene		1.0
1,1,2-Trichloro		
-1,2,2-trifluoroethane		1.0
Trichlorofluoromethane		1.0
Vinyl chloride	0.002	
Xylenes (total)	10.0	
Arsenic	0.05	
Barium	5.0	
Cadmium	0.01	
Chromium	0.05	
Lead	0.05	
Mercury	0.002	
Selenium	0.01	
Silver	0.05	

<sup>1</sup> A class of chemicals and compounds. No single test is available.

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TABLE 4

SCHEDULE FOR CLOSURE OF THE  
BULK STORAGE TANKS T-5 AND T-6

<u>Action</u>	<u>Cumulative Days to Complete</u>
o Initiate Closure of Tanks Approval of Closure Plan by U. S. and Ohio EPA	0
o Remove and Store Any Remaining Wastes at an FMPC RCRA Storage Location	30
o Decontaminate Equipment and Containment Structure; Sample Final Rinseates	60
o Sample Surrounding and Underlying Soils	60
o Analyze Washwater Rinseates and Soils	120
o Decontaminate and Sample as required after initial Rinseate Sampling; Resample	180
o Storage Pad and Soil Removal as Required by Sample Results	180
o Analyze Washwater Rinseates and Soils	240
o Certification of Closure	300





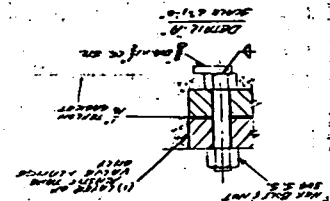
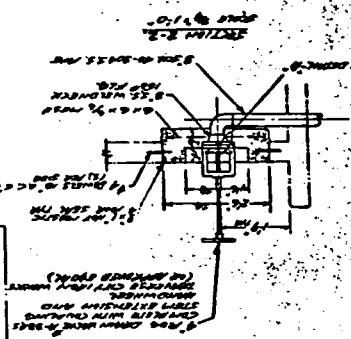
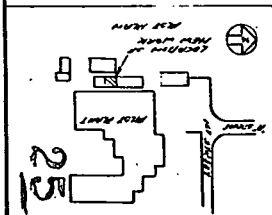
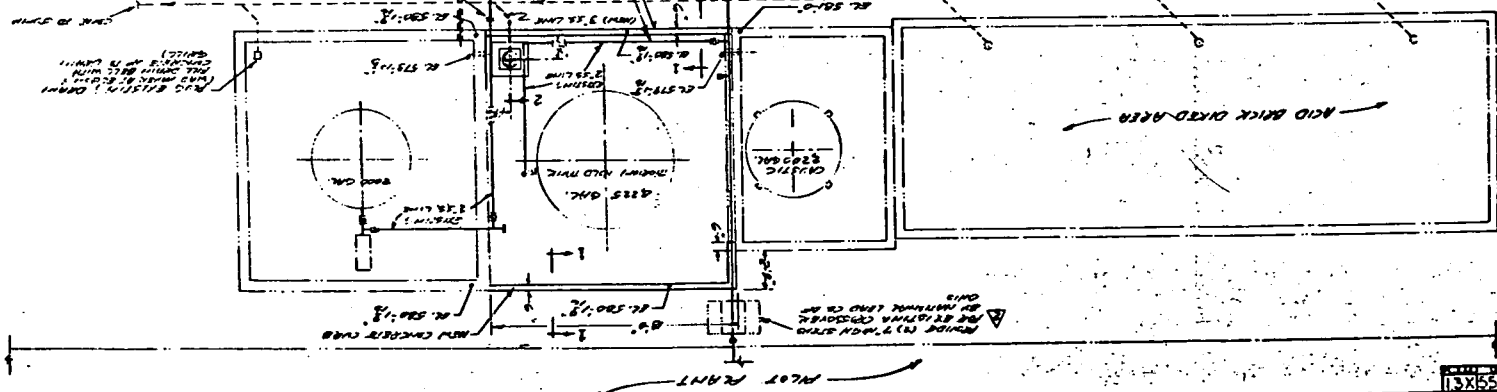
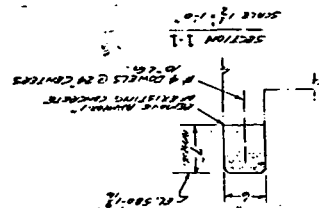
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DO NOT SCALE REDUCED DRAWING

NEW WORK  
EXISTING FACILITIES  
LEGEND

FIGURE 2  
PLOT PLANT  
OUTSIDE TANK AREA

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